

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

UNITED STATES OF AMERICA

v.

DANIEL MENDOZA (1)  
ALEJANDRO FLORES (2)  
MIRANDA MOORE (3)  
CESAR MENDEZ (4)  
a.k.a. "Kabuki"

§  
§  
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§  
§  
§  
§  
§

No. 4:18CR  
Judge

188  
Crane

INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

Count One

Violation: 21 U.S.C. § 846 (Conspiracy  
to Possess with the Intent to Manufacture  
and Distribute Methamphetamine)

That from sometime in or about January 2016, and continuously thereafter up to  
and including October 10, 2018, in the Eastern District of Texas and elsewhere,

**Daniel Mendoza  
Alejandro Flores  
Miranda Moore  
Cesar Mendez, a.k.a. "Kabuki"**

defendants, did knowingly and intentionally combine, conspire, and agree with each other  
and other persons known and unknown to the United States Grand Jury, to knowingly  
and intentionally possess with the intent to manufacture and distribute 500 grams or more  
of a mixture or substance containing a detectable amount of methamphetamine or 50  
grams or more of methamphetamine (actual), a violation of 21 U.S.C. § 841(a)(1).

**FILED**

OCT 10 2018

Clerk, U.S. District Court  
Texas Eastern

In violation of 21 U.S.C. § 846.

**Count Two**

Violation: 21 U.S.C. § 846 (Conspiracy to Possess with the Intent to Distribute Heroin)

That from sometime in or about January 2016, and continuously thereafter up to and including October 10, 2018, in the Eastern District of Texas and elsewhere,

**Daniel Mendoza  
Alejandro Flores  
Miranda Moore**

defendants, did knowingly and intentionally combine, conspire, and agree with each other and other persons known and unknown to the United States Grand Jury, to knowingly and intentionally possess with the intent to manufacture and distribute 1 kilogram or more of a mixture or substance containing a detectable amount of heroin, a violation of 21 U.S.C. § 841(a)(1).

In violation of 21 U.S.C. § 846.

**NOTICE OF INTENTION TO SEEK CRIMINAL FORFEITURE**

As a result of committing the offense charged in this Indictment, the defendants shall forfeit to the United States, pursuant to 21 U.S.C. § 853, all property used to commit or facilitate the offenses, proceeds from the offenses, and property derived from proceeds obtained directly or indirectly from the offenses, including but not limited to the following:

All such proceeds and/or instrumentalities are subject to forfeiture by the government.

A TRUE BILL

  
\_\_\_\_\_  
GRAND JURY FOREPERSON

JOSEPH D. BROWN  
UNITED STATES ATTORNEY

  
\_\_\_\_\_  
ERNEST GONZALEZ  
Assistant United States Attorney

10-10-18  
Date

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v.

DANIEL MENDOZA (1)  
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No. 4:18CR\_\_\_\_\_  
Judge \_\_\_\_\_

**Count One**

Violation: 21 U.S.C. § 846

Penalty: If 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine or 50 grams or more of methamphetamine (actual) -- not less than 10 years and not more than life imprisonment, a fine not to exceed \$10 million, or both; supervised release of at least five years.

Special Assessment: \$100.00

**Count Two**

Violation: 21 U.S.C. § 846

Penalty: If 1 kilogram or more of a mixture or substance containing a detectable amount of heroin -- not less than 10 years and not more than life imprisonment, a fine not to exceed \$10 million, or both; supervised release of at least five years.

Special Assessment: \$100.00